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ABSTRACT

The Distance Learning Policy Laboratory of the Southern Regional Education Board (SREB) and many states and regional organizations are coming to a consensus on the principles and goals that should shape distance learning policies. In the case of quality assurance, the SREB believes there are four guiding principles that states should follow. States should take advantage of state, regional, and national networks for sharing high quality offerings, and reciprocity should be maximized. States should demonstrate a commitment to innovation and a desire to move the best of these practices into mainstream activities. State quality assurance policies should focus on the needs of the student, and state policies should be shaped with the understanding that "distance" is not a defining characteristic of learning processes; rather, it is one among many factors to take into account in designing effective programs. Within these guiding principles, the quality assurance subcommittee has prepared seven recommendations for consideration by the Distance Learning Policy Leadership Group and the SREB. These involve: (1) review of current oversight policies; (2) adoption of "best practices"; (3) development of more effective mechanisms to learn student views concerning the quality of distance learning offerings; (4) extending and formalizing the "free trade zone" concept in the electronic campus; (5) working toward consistent, coordinated, unbiased, and nonduplicative reviews; (6) accelerating work to include outcome measures in accountability mechanisms; and (7) establishing common definitions and state data reporting mechanisms. Two appendixes contain a quality practices survey and a list of respondents to this survey. (SLD)

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Distance Learning Policy Laboratory

The Challenges of Quality Assurance in a Distance Learning Environment

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The Challenges of Quality Assurance in a Distance Learning Environment

June, 2002

A report by the Distance Learning Policy Laboratory
Quality Assurance Subcommittee

A Report and Recommendations in a Series on
Distance Learning Policy Issues

About the Southern Regional Education Board Distance Learning Policy Laboratory

At its June, 1999, meeting, the Southern Regional Education Board approved the establishment of the SREB Distance Learning Policy Laboratory. Building upon the work of the Educational Technology Cooperative and the *Electronic Campus*, the Policy Laboratory seeks to reduce or eliminate existing or potential policy barriers to distance learning activities in three broad areas: ***access, quality,*** and ***cost***. The Policy Laboratory's main objectives are:

- Assessing educational policy issues that are identified as barriers;
- Establishing policy baselines of current practices, procedures and strategies;
- Assisting states and institutions as they develop ways to use technology to improve quality, expand access, and reduce costs;
- Establishing trial or pilot efforts with State Partners to test new distance learning approaches or strategies;
- Promoting state-level policy changes via existing SREB organizational arrangements and agreements;
- Developing and testing agreements among institutions and states;
- Utilizing the regional platform to serve as a clearinghouse for states and institutions to discuss policy issues and concerns; and
- Measuring the implementation of policy changes in the SREB states and widely disseminating the results.

The SREB Distance Learning Policy Laboratory is supported in part by a grant from the United States Department of Education Fund for the Improvement of Postsecondary Education's (FIPSE) Learning Anytime, Anywhere Partnerships (LAAP) program. The contents of this report were developed under the grant but do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government. Additional support has been provided by a grant from the Stranahan Foundation of Toledo, Ohio.

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Executive Summary

The purpose of the Quality Assurance subcommittee is to examine the challenges to state and system quality review processes posed by distance learning and to recommend needed changes. The recommendations are directed at state and system leadership and staff, but have implications for other quality assurance bodies and institutions.

Traditional regulatory approaches to quality assurance are severely tested in the distance learning environment. Most of our accountability structures, for example, are tied to political and geographic boundaries and to traditional standards of excellence, based on the presence of physical and intellectual resources onsite. In contrast, distance learning, driven by the global reach of the Internet, has not only evolved beyond these geographic boundaries but is embracing new standards of quality. State and system boards are struggling to balance the goals of student access and innovation with traditional consumer protection functions. National providers, both public and private, are finding it difficult to operate in the maze of federal, state, and accreditation oversight that currently exists.

The emergence of voluntary "best practice" standards is encouraging, however, and many states in the South have adopted national and regional standards. In our survey of state quality assurance initiatives, we also discovered a number of other promising actions, including the development of state and institutional strategic planning in distance learning.

States will continue to be challenged by the changing marketplace, and our report calls attention to such issues as evaluation of consortia and non-educational vendors, evaluation of courses and modules, and dealing with "blended programs."

Principles and Recommendations

The Distance Learning Policy Laboratory of SREB, as well as many states and regional organizations, are coming to a consensus on the principles and goals that should shape our distance learning policies. In the case of quality assurance, we believe there are four guiding principles that states should follow:

- States should take advantage of statewide, regional, and national networks for sharing high quality offerings, and reciprocity should be maximized.
- States should demonstrate a commitment to innovation and a desire to move the best of these practices into mainstream activities.
- State quality assurance policies should focus on the needs of the student.
- State policies should be shaped with the understanding that "distance" is not a defining characteristic of learning processes; rather it is one among many factors to take into account in designing effective programs.

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Within these guiding principles, the quality assurance subcommittee submits the following recommendations for consideration by the Distance Learning Policy Leadership Group and SREB.

1. *States should review their current oversight policies to see if they meet the test of: a) taking advantage of regional and national assets; b) promoting innovation; and c) being student-centered.* This review should take place in the context of the principles described in this report, namely toward the goals of developing a "regional free-market" in the South and encouraging innovation. As a regional convening body, SREB can greatly aid in this process of review.

2. *States and institutions should consider adopting the "best practices" highlighted in this report, particularly those which use peer-review approaches.* Our survey of states turned up a number of encouraging practices and guidelines that are likely to improve the quality of distance learning opportunities.

3. *States should encourage their institutions to develop more effective evaluative mechanisms to learn student views concerning the quality of distance learning offerings.* Regional organizations like SREB, along with state and system-level virtual universities, should encourage states to include easily accessible student evaluations in their information systems and web sites. The recommendations made by the Pew Learning and Technology program for online course evaluation systems are a good starting point for designing these evaluation systems.

4. *SREB should extend and formalize its current "free trade zone" concept in the Electronic Campus, establishing a system of institutional and program reciprocity where approval under agreed-upon standards in one jurisdiction is extended to and accepted by others in the South.* While we do not expect that SREB alone can sort out the complexity of overlapping and conflicting standards described in this report, we do believe its leadership can establish a precedent that may inspire all parties toward better cooperation and more open access to all legitimate providers. States and regional accrediting bodies have a special obligation to coordinate their licensing and review activities and to establish ongoing structures for dialogue regarding acceptable standards in the field of distance learning.

5. *State agencies with responsibilities for oversight of distance learning activities have an obligation to work toward consistent, coordinated, unbiased, and non-duplicative reviews.* Again, we do not expect states to be able to sort out all of the issues raised by entities outside of their control (such as the Federal government), but we do believe that much progress can be made in quality assurance through communication and the development of a greater consensus within the standards-setting community operating in a state.

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6. *States and institutions should accelerate their work to include outcome measures in their accountability mechanisms for both traditional and distance learning programs.* We are encouraged by the development of competency-based measures and exams in higher education as well as the emphasis placed upon outcome measures by accrediting bodies. Many of these efforts are aimed at developing better institutional outcome measures; but as was clearly apparent in recent national efforts to "grade" the states on student learning, there is a pressing need for more and better indicators.

7. *SREB, through the Electronic Campus and Data Exchange initiatives, should work to establish common definitions and state data reporting mechanisms for technology-mediated learning activities in the region.* A continuing challenge for states is the lack of common data collection techniques and even common definitions of the range of technology-mediated activity. SREB can build upon the work already underway to establish workable procedures to aid in assessment activities.

The purpose of the Quality Assurance subcommittee is to examine the challenges to state and system quality review processes posed by distance learning and to recommend needed changes. Given the close interdependence that exists among federal, state, and voluntary accreditation activities, the recommendations found here have some applicability beyond the state level, including applicability to private college consortia and individual institutional review processes. More fundamental structural change will also depend upon action and leadership at the federal level.

Changing student characteristics, changing societal and higher education environments, and increasingly advanced and affordable technologies continue to support the growth of distance learning. The flexibility offered to students, as well as the need to efficiently and affordably provide a broad range of educational opportunities to growing higher education populations, provide strong arguments for its positive future.

But many tools—including distance learning technologies and practices—can be used for good or ill. The growth of distance learning also creates the potential for opportunistic providers to engage in poor educational practice and diploma mill-style fraud. The recent growth in the number of unaccredited, for-profit providers engaging in questionable marketing and content delivery practices raises very serious concerns among higher-education leaders. Abuses are not new in higher education, but the ability to use technology to efficiently and cheaply reach a broader market is enticing, and doing so can be quite profitable. Enabling innovation in the promising field of distance learning—while guarding against abuse—presents a real challenge to those charged with responsibilities to ensure quality.

Those same issues challenge potential students, as well. How can they be sure that what they are paying for is a "good" course, offered by a "reputable" or "accredited" provider that will remain in business over the long term? Those questions are often difficult to answer, even by those generally well informed about higher education. While responsibility to police diploma-mill activity will fall to state consumer protection entities, it is exceedingly difficult to locate and monitor Internet-based activity that can be initiated by any single person with access to the World Wide Web and that can occur from any location. The first line of defense will, by necessity, be consumer awareness and better information. State higher education agencies and institutions will need to play a greater role in educating the general public on the determining factors that characterize quality instruction.

Ensuring that public funds support quality higher education, and providing guidance and assistance to those seeking to identify high quality distance learning opportunities, will become even more important in the foreseeable future. This report analyzes some of the challenges those tasks imply, examines what states are now doing to meet them, identifies emerging issues and promising approaches, and makes recommendations about steps that should be taken to strengthen quality assurance.

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The Challenges of Quality Assurance in a Distance Learning Environment

Quality assurance and accountability for performance are of considerable concern to state and federal policymakers and accrediting bodies alike. This concern has taken two forms: 1) the desire to improve the effectiveness of all our educational institutions; and 2) the need to protect students and the public from fraud and abuse. While both performance enhancement and consumer protection are a part of most accountability systems, the emphasis in recent years (at least among states and accrediting bodies, if not the Federal government) has shifted decidedly in the direction of measuring and increasing the level of performance.

Whether concerns about quality and consumer protection should be any greater in the distance learning environment than traditional environments is debatable, but new delivery mechanisms face a "burden of proof" in the minds of many policymakers and traditional academics.

The particular challenges faced in providing effective quality assurance mechanisms in distance learning include the following:

The Boundary Problem

Most of our current accountability structures are tied to political and geographic boundaries, whether they are organized around state, regional, or national lines. The reality of distance learning, however, is that it respects no such boundaries. Courses and programs are now widely available in a worldwide marketplace of educational providers, often with no more effort than the click of a mouse. Governmental agencies and accrediting bodies must not only determine the extent to which they can assert their jurisdictional authority, they now should (but often don't) coordinate development of standards as well as the application of approval processes and sanctions with a wide array of other players.

The Standards Problem

Traditional programs have benefited from widely held assumptions about what constitutes a quality educational experience. In general, the presence of certain resources and characteristics are presumed to indicate or ensure quality. For example, the employment of full-time faculty with appropriate degrees, the presence of an adequate library and physical plant, and a system of shared governance are at the heart of traditional accreditation standards and program approval policies of states and systems. Yet different standards may be needed for distance learning programs which may not have full-time faculty in the traditional sense, or even a physical campus.

To respond to that challenge, a set of standards, less tied to physical assets and more to the presence of "good practice," is evolving to judge acceptable levels of quality distance learning as well as conventional instruction. As for outcome measures, both traditional and distance

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learning programs are equally challenged in providing valuable and relevant information to judge learning effectiveness. Higher education's shortcomings in this regard were readily apparent in the national project *Measuring Up 2000: The State-by-State Report Card for Higher Education*, as *Measuring Up* gave each state an "incomplete" on the "Learning" indicator.

The Regulation Problem

Regulation, already losing favor in traditional oversight activities, may be especially ineffective in guiding distance learning. The Internet—now the medium of choice for the majority of distance learning activity—is particularly resistant to governmental regulation, as policymakers in other arenas have discovered. Furthermore, in an environment where standards of practice are rapidly changing, codification can be an unintentional inhibitor of promising innovation. More problematic is the dilemma of enforcement. Given the distributed nature of instructional providers and students, state agencies can easily find themselves with tough laws that are virtually unenforceable. The postsecondary education community needs to be sensitive and watchful of those who seek to take advantage of students seeking Internet-based or distance learning. Because distance learning is becoming increasingly difficult to monitor, better consumer information may be the best approach to combating fraud. SHEEOs and higher-education institutions need to adopt the best practices outlined in this report and take an active approach to better educate consumers to evaluate quality for themselves.

The Constitutional Problem

While not yet an issue for the federal courts, national providers of distance learning, faced with multiple standards and regulations from states and accrediting bodies, could potentially challenge such oversight on constitutional grounds. The issue, according to Michael Goldstein, an attorney and expert on state regulation, hinges on a delicate balance between whether education, as it is evolving, is perceived by the courts as a product of "commerce" (and therefore protected from unnecessary state control) or is defined as one of the principal "reserved powers" granted to the states. As an international commercial product, state regulation might well be limited as "restraint of trade" under the U.S. Constitution. For now, state regulation of education rests upon the "reserve clause" of the 10th amendment. The question then becomes: Even if control of postsecondary education is a "reserved power" of the states, when does an institution have enough "physical presence" of the entity within the state to permit the state to exercise oversight? In the past this power has limited the state regulation, for example, of correspondence programs. States have landed firmly at both extremes, some completely avoiding attempts to regulate e-learning, or others enacting laws that encompassed electronic instruction. Statutes in some states have now encompassed electronic instructional activity even if the institution has absolutely no "physical" or

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organizational presence in the state—an extension of regulatory authority that may be questionable, if challenged.[1]

The Parties and their Roles in Quality Assurance

Traditionally, the parties to quality assurance have been referred to as the "Triad," which includes the states, the federal government, and the accrediting community. Although each of these parties has somewhat different functions and responsibilities, to the institutional applicant, their activities often look like a maze of duplicative, and sometimes contradictory, standards and processes. Moreover, the "Triad" represents a far more complex array of quality assurance and consumer protection oversight than the simple "threesome" conveyed by this term. And to a surprising degree the three legs of the "Triad" are interdependent. Access to federal aid, for example, depends on having state authorization and federally recognized accreditation, while accreditation always requires state authorization as a prerequisite. In addition, state authorization statutes frequently delegate to accrediting bodies all or many aspects of quality assurance.

Stresses and legitimate differences of opinion exist within each member of the Triad and between them as well. Entities making up the Triad operate in continually shifting educational, political, and economic environments that vary state-by-state, region-by-region, and, for all geographic divisions, over time. Influences and pressures on the Triad partners come from different sources (i.e. faculty seeking to ensure high standards, institutions seeking to limit competition, legislators supporting workforce goals, and the business aspirations of for-profit providers). The partners may therefore have different underlying goals, causing them to react to change in different ways. These realities present a perplexing situation for new providers, and for existing providers seeking to do new things.

The parties involved in the quality assurance process include:

The U.S. Department of Education. By establishing a wide range of rules and regulations to which institutions wishing to participate in federal student aid programs must adhere, the Department exercises substantial control over virtually every degree-granting institution in the United States. (Only the tiny few who choose to exclude their students from federal aid are exempt.) Distance learning providers face additional federal regulations that dictate:

- the proportion of a degree program's courses that may be offered via distance learning;
- the manner through which providers can contract with other organizations and companies to market and promote their services;

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[1] The statute in Georgia (Georgia Code, Sec. 20-3-250-7) reads "no institution may offer postsecondary education…to Georgia residents from a location outside this state by…any telecommunications or electronic media technology unless issued a current (Georgia) certificate of authority." In the case of Colorado, an institution is deemed to have a physical presence in the state "if it delivers…instruction in Colorado and receives assistance from any other organization within the state, such as, but not limited to a cable television company or a television broadcast station that carries instruction sponsored by the institution." (Policies of the Colorado Commission on Higher Education, Sec. 2.04.02)

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- the manner in which recruiters can be compensated;
- the amount and manner of instruction that is offered on a weekly and semester basis;
- the nature of credit load standards and inter-institutional agreements; and
- the way satisfactory academic standards of progress might be measured.

Since a lack of access to federal student aid funds is almost always fatal for an institution—dramatically limiting an institution's ability to attract students—these rules (encompassing many hundreds of pages in the Code of Federal Regulations) rise to the level of absolute obligations.

The Veterans Affairs Office. By applying 1950's era laws enacted by the Congress to prevent fraud in the use of GI Bill funds, the federal Veterans Affairs (VA) Office exercises approval authority over institutions at which veterans choose to enroll and use VA benefits. Today, the VA office continues to impose limits on the use of distance learning and maintains significant oversight of institutions of higher education. VA standards are established and applied separately from those of the U.S. Department of Education.

State Licensing Agencies. Under the "Reserved Powers" clause of the Tenth Amendment to the Constitution, control of education has, for over two centuries, been deemed to lie with the states. In turn, state statutes vest the authority to license and/or regulate postsecondary institutions across a wide-variety of variously configured state agencies. Some state agencies regulating higher education are independent governmental bodies (e.g. New York, California); some are within the state departments of education (Florida); some are within statewide coordinating boards (Texas); and a few are located within system-wide governing boards for public institutions (e.g. North Carolina). Theoretically, an institution must first seek and obtain a license to operate in a state before it can seek accreditation or federal approval to participate in student aid programs. In practice however, the processes tend to be simultaneous. Further, many states provide a wide range of exemptions from licensure and re-licensure, most commonly to institutions that are already regionally accredited and those with religious purposes. Standards for licensure vary widely, but are increasingly keyed to regional accreditation standards. To complicate matters, standards for the licensure of out-of-state institutions are often different (and sometimes significantly more strict) than those for in-state institutions. These state licensing agencies may also serve as repositories for student records in the case of institutional closure, and may establish policies regarding security bonds and tuition refunds.

State Consumer Protection Agencies. Usually resting within Offices of Consumer Affairs or under the purview of the state attorney general, these agencies receive consumer complaints and enforce the states' consumer protection legislation. In some cases they include an investigative wing to pursue cases of financial aid fraud and other abuses of public funds. In at least one state (California), the institutional licensing agency is part of the state consumer protection agency.

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State Coordinating Boards and System-wide Governing Boards. Nearly all states have established bodies with the authority to approve new, and in some cases to review existing, academic programs. In most cases, this authority extends only to public institutions, but in a few cases control extends to private independent institutions as well. These bodies often develop rules or policies affecting distance learning. Some states, including states in the South, have system governing boards with program approval authority over campuses, as well as statewide coordinating boards with similar over-riding approval authority. The application of program review policies varies widely, however, even among states with similar statutes and regulatory bodies. In practice, state coordinating boards may delegate many review responsibilities to the institutions or exempt some institutions and programs from review. In recent years, state and system review practices have become less centralized.

Accrediting Bodies. Like federal oversight by the U.S. Department of Education, voluntary accreditation encompasses virtually all of the degree-granting institutions in the United States. While a voluntary process, without regional or national accreditation from one of these federally approved bodies, institutions are unable to participate in federal aid programs. This results in a voluntary process being, de facto, an essential requirement in order to operate in the United States. Institutions develop accreditation standards collectively, and "peer" representatives from similar institutions conduct reviews. In recent years, the regional accrediting community has made concerted efforts to develop relatively common standards of good practice and to gain consensus across accrediting bodies. Nevertheless, important differences in standards and practice remain, encouraging a certain degree of "forum shopping" to find the most amenable accrediting body.

In addition to regional accrediting bodies, institutions are also subject to review by professional accrediting organizations that focus on particular fields or programs (i.e. medicine, law, and business). They may, and often do, impose program-specific standards on an institution. Finally, "national" accrediting bodies offer accreditation based on various approaches to education, or groupings of various disciplines. Some institutions seek accreditation by those entities, instead of—or in addition to—regional accreditation.

Professional Licensure Boards. These are either state entities or organizations acting for the state. By limiting individual access to a profession, they control the use of credentials and impose standards that can render an academic credential useless. Some professional boards may grant limited licensure to graduates of "approved institutions," and sometimes those may only be institutions located within the state. They may impose residency requirements, and often exclude "correspondence study" from qualified programs. In terms of the effect on distance learning, many of the rules of such boards, dating to a time when the telephone was considered a "new" technology, do not differentiate between forms of learning at a distance. In concert with professional accrediting bodies, they are a powerful force for imposing standards of learning and educational practice.

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The above suggests that there is a continuing need for coordinating and standard-setting among the various players in the quality assurance arena. In the absence of federal action, it may—and perhaps should—be left to the states and regional associations to exercise that leadership.

Current Activities of State Coordinating and System Governing Boards

In order to determine the current status and practice of distance learning oversight by state higher education systems and agencies, the Quality Assurance Subcommittee of Distance Learning Policy Laboratory surveyed state-level higher education boards in the Spring of 2001. (See Appendix A for a list of responding entities and Appendix B for a copy of survey questions). Responses were received from 35 of the 50 states. Highlights from this survey include the following:

- 83% (29 of 35 respondents) indicated that their agency had "adopted rules or policy statements on distance learning expectations."
- Most states (57%) have relied upon the standards of good practice promulgated by one or more of the regional organizations or accrediting bodies.
- Thirteen states (40%) have required institutions to develop specific distance learning plans.
- Most states (69%) limit their oversight to stating expectations; less than a quarter indicated that they "audit" offerings.
- When complaints are received about online learning, they are typically referred to the offering institution for resolution.

Strategic Plans. In our survey of states we asked about the existence of both statewide and institutional-level plans for distance learning. Fewer than half of the states indicated that they had adopted such plans, and only 37% of the states include provisions for quality assurance. Even fewer state agencies (26%) require the institutions under their oversight to adopt strategic plans, and only 20% require the inclusion of quality assurance mechanisms in those plans. When asked what elements a strategic plan should contain, survey respondents recommended the following provisions:

- Mission: An institution's strategic plan for distance learning should reflect state needs as well as system and institutional missions. Plans should address methods of inter-institutional collaboration and incorporate reward systems to encourage such collaborations where appropriate.
- Prior Planning: Strategic plans should be based on a thorough needs assessment and prior consideration of: 1) technological needs and available resources; 2) enrollment projections; 3) market forces and service areas; and 4) financial assessments, including costs.
- A focus on student needs and access, including affordability and support service needs

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- Faculty skill development, including course development and technical support
- Ready student access to adequate learning resources, including libraries, facilities, and equipment
- Provisions for quality control, including specific benchmarks and indicators to be used
- Minimal standards for: 1) faculty qualifications, 2) faculty-student interaction, and 3) courseware/content
- Specific statements regarding assigned roles and responsibilities for all involved parties
- Specific faculty ownership, intellectual property, and compensation policies
- Provisions for confidentiality and communications security

Outcome Measures and Comparative Studies. In the April 2001 survey, only three states reported comparing the results of on-campus cohorts to distance learning cohorts. The University of Wisconsin System Administration notes that "students in the distance learning perform at least as well as on-campus cohorts, if not better." The University of North Carolina Office of the President also reports that off-campus students do at least as well in their courses as on-campus students do. But even fewer states compare the performance of on-campus students to distance learning students on outcome measures such as state licensure exams. Only Texas reported using an outcome measure to evaluate distance learning programs—in this case, comparing distance learning students' performance on nursing licensing exams with those of on-campus cohorts.

Special Distance Learning Approval Processes. Some state agencies require prior approval for all distance-learning offerings. Fifty-seven percent report that state agency staff must first review and approve proposed offerings before they can be made available to students. Others require reviews only in special circumstances. West Virginia, for example, requires staff review only for courses submitted to the *Electronic Campus*. In New York, an institution can choose either an individual review of proposed programs or an "Institutional Capability Review" (see web.nysed.gov/ocue/distance). Other states, such as Wisconsin, Louisiana, and Georgia, require a stringent prior review only for whole degree programs, and quality assurance for particular courses occurs at the local campus level.

These practices leave many states, however, with policies that fundamentally are "delivery medium neutral." Other states that adhere strictly to a "geographic service area criteria" in traditional programs (e.g. in developing off-campus centers) have waived or ignored such requirements in approving distance learning programs. In most cases, new distance learning offerings of existing programs are not subject to state review (or in some cases go through a shorter and more streamlined process).

Peer Review. Survey respondents rated peer review as the most effective method of ensuring quality. In some states, peer advisory committees have been established to review proposed offerings, generally with a principal focus on quality issues. A peer review process is required

in a third of the reporting states. Several organizations, including the Kentucky Community and Technical College System (KCTCS), have found implementation of a peer review to be highly effective in increasing the knowledge and skill of course developers. Survey respondents also noted that this approach is most effective when conducted at the campus level for several reasons. For one, faculties are typically more critical judges of the quality of offerings and interactive teaching. Peer involvement also lends great credibility to the process and its outcomes; it also encourages greater collaboration and consultation among faculty members. However, faculty peer review programs can be very expensive and time consuming to develop and maintain.

Audits. Quality audits of distance learning offerings are practiced by about 27% of the state agencies and are viewed as effective in ensuring quality. The South Dakota Board of Regents reports that it has implemented a pilot project of randomly auditing 10% of the distance learning course offerings. In some cases, faculty peers from other institutions audit a course and critique it to improve quality.

Peer audits through accrediting agencies may occur when an institution's distance learning offerings constitute a "substantive change" for the institution; in addition, distance learning offered by regionally accredited institutions is evaluated within the context of each institution's regular accreditation (generally, ten-year) review.

Best Practice Forums. Although there was great interest in developing them, few state systems or boards currently arrange forums for the sharing of best practices in distance learning to supplement the opportunities presented by national or regional professional organizations. Oregon has conducted various forums to showcase best practices and highlight what several faculty were doing from several disciplines in redesigning courses for the Web. Alabama has arranged two such forums, which have been effective in establishing a network of persons interested in the topic. Several states (e.g. North Carolina, Ohio, and Kentucky) hold annual conferences to bring together faculty involved in distance learning and to showcase their efforts.

Voluntary Standard Setting

One of the most positive developments in distance learning quality assurance has been the emergence of the voluntary standards movement. Initiated by the Western Cooperative for Educational Telecommunications (WCET), standards of "good practice" have become a staple of regional, state, and institutional quality assurance. (See http://www.wiche.edu/telecom/projects/balancing/principles.htm). Numerous states and accrediting bodies have adopted WCET or similar principles. In 1997, the *Electronic Campus* of SREB adopted its own version of Principles of Good Practice to be used by states as a guideline for listing courses on the *Electronic Campus* web site. Currently, state partners provide a written assurance that offerings listed from their state are following these guidelines. By forming an agreement among the participating states, SREB has established a "free trade zone" for participating colleges and universities in the 16 states, eliminating the

need for institutions delivering these "certified" courses and programs in the regional marketplace to seek licensure or approval. (See www.electroniccampus.org)

Among the other national and regional organizations that have promulgated principles of good practice are the following:

The American Distance Education Consortium (ADEC)
http://www.adec.edu/admin/papers/distance-learning_principles.html

The American Federation of Teachers (AFT)
http://www.aft.org/higher_ed/downloadable/distance.pdf

The Council of Regional Accrediting Commissions (C-RAC)
http://www.wiche.edu/telcecom/guidelines.htm

The Institute for Higher Education Policy (IHEP)
http://www.ihep.com/quality.pdf

In a review of these standards, the Pew Learning and Technology Program (http://www.center.rpi.edu/pewsym/mono3.html) noted the high level of convergence among the various standard setting exercises. In 2000, a roundtable of experts-called these standards "adequate" rather than "best" practices: "Several of the symposium participants pointed out that we in higher education are willing to 'settle' way too soon, accepting a level of performance that is erratic. There is no concept of 'world class'...of meeting or exceeding customer expectations...." (p. 9)

The Pew Roundtable also noted that all of the standard setting exercises had avoided much specificity on inputs (such as class size), or measures of outcomes, suggesting further work within the standards setting community.

Actions by Accrediting Bodies

Led by the Council on Higher Education Accreditation (CHEA) and a new cooperative spirit among the regional bodies, the accrediting community has taken a number of actions in recent years to address the challenges posed by distance learning. Each of the regional associations, for example, has adopted a "Statement of Commitment" and "Best Practices" document that encourages cooperation and institutional excellence in distance learning. In the area of outcomes, the regional bodies have steadily moved toward more fully incorporating this concept in their standards.

Equally encouraging is the effort of these bodies to more closely coordinate their institutional reviews with those of the states. The Middle States Commission and the New York State Education department, for example, are near agreement in this area—a step that will

significantly reduce the time and effort required of institutions in that state. (See http://www.msache.org/special.html)

Emerging Issues

In our review of quality assurance practices, a number of issues emerged as likely problems for states and accrediting bodies in the near future.

Evaluating Consortia and Non-educational Providers of Services

Not only are institutions developing curricula jointly (e.g. Georgia's "eCore™" program), they are outsourcing many instructional or administrative functions to a variety of vendors, including those who are assuming important academic functions such as online tutoring and content development. This adds to the complexity of state, system, or accrediting body reviews and makes it difficult to determine an accountable "controlling authority." Should quality assurance bodies extend their reviews to these private providers, such as tutorial services, call centers, Web-course developers? Or should they continue to limit their reviews to the degree-granting entity and assume that this body is exercising appropriate quality control over sub-contractors?

Accrediting bodies have taken a pragmatic "results-oriented" approach to this dilemma. Rather than accrediting the vendors, they hold the degree-granting institution accountable for the vendors' actions.

Evaluating Courses and Modules

One of the effects of technology has been to disaggregate instructional content and the learning experience of students into smaller and smaller units. Educational experiences and degree programs are more likely today to be a series of courses, even sub-course learning modules, rather than a holistic "college experience." While traditionalists lament this development, the trends are clear. The "product" (content or knowledge) purchased by "consumers" (students) may be in much smaller units in the future. This suggests that our accountability systems will need adjustment as well. The quality of student experiences can vary widely, even within the same institutional and program framework. If we are to gain customer feedback for quality assurance to add to our expert or peer reviews, it will perhaps have to be done at least at the course level, and perhaps at the smaller "unit" level as well.

An approach to that problem, as noted in the Distance Learning Policy Laboratory Faculty Subcommittee report, is the *MERLOT* initiative, a consortium of systems and institutions established to develop a process for conducting peer reviews of online instructional modules, course materials, or "learning objects." *MERLOT (*www.merlot.org*)* now includes hundreds of ratings of online instructional materials in more than a dozen disciplines.

This effort to provide better information and access to digital materials is also promoted by two "standards" efforts: 1) the "IMS" project (Instructional Management Systems project; see www.imsproject.org), which includes institutions and publishers; and 2) SCORM (Sharable Content Object Reference Model; see http://www.adlnet.org), which is a Department of Defense led initiative. SCORM also includes a digital library of learning modules managed by the Advanced Distributed Learning (ADL) initiative based at the University of Wisconsin.

Dealing with "Blended" Programs

Many states have assumed that there is a clear distinction between distance learning and traditional face-to-face classroom instruction. This would suggest, then, the need for distinct criteria and separate review processes. But a "blended" or "mixed" model of delivery is emerging as the preference of both students and faculty. In the "partial Internet" course, for example, there may be a significant asynchronous online component combined with face-to-face meetings. This suggests that separate processes of approval and review may not be necessary, especially as distance learning matures (a view that many accrediting bodies are taking). Many institutions are now developing proposals for new degree programs with the assumption that the program will be delivered in multiple formats—some sections and courses may be face to face, others may be completely asynchronous, and still others may use the "blended" model.

Consumer Information/Feedback Systems

In its evaluation of current consumer information and feedback programs, the Pew Roundtable on Quality Assurance evaluated existing search engines for finding courses on the Web. The members noted several shortcomings, including the following:

- Listings by institution and course number instead of sorts by topic or program
- No differentiation regarding enrollment requirements (i.e. whether the student needs to matriculate in the institution or degree program in order to enroll)
- No information on face-to-face and prerequisite requirements
- Poor contact information
- Insufficient information on course requirements
- No reporting of outcome measures (e.g. drop, failure, or withdrawal rates)

In developing information systems for students, institutions and faculty should provide a realistic assessment of what it takes for successful completion of a distance learning course (e.g. greater self-discipline and higher levels of information "literacy" skills). Such a realistic preview is likely to reduce dropouts.[2] (This issue is thoroughly discussed in the Distance

[2] "Realistic Previews" are used in organizations to screen out job applicants who will later be dissatisfied and to better prepare new hires for the job experiences ahead of them. Presenting clear, in-depth information on both the positive and negative aspects of a job typically increases job tenure, organizational commitment, and job performance. Realistic

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Learning Policy Laboratory report entitled *Anytime, Anyplace Services for the 21st Century Student,* developed by the Student Services Subcommittee.)

The Pew Roundtable also recommended that institutions develop more systematic and useable consumer rating systems, based not on generalizations but on the presence of predetermined elements that experts agree constitute "good practice." For example, students could rate their satisfaction on a Likert scale of 1-5, which would then be translated into a "satisfaction index." (Robert Heterick and Carol Twigg elaborated on this concept in their April 1, 2001 newsletter: "The Learning Marketplace." See http://www.center.rpi.edu/Lforum/lm/Apr01.html)

Among the questions students might be asked are the following:

1. Was the technology easy to use?
2. Was it reliable?
3. Was the course relevant and up-to-date?
4. How challenging was the course?
5. Did you receive the help you needed?
6. Did you receive adequate feedback?
7. Was there sufficient interaction (with students, with faculty)?
8. Did you have sufficient access to learning resources?
9. Were assignments clear?
10. Did you receive adequate technical assistance?

Principles and Recommendations

The Distance Learning Policy Laboratory of SREB, as well as many states and regional organizations, are coming to a consensus on the principles and goals that should shape our distance learning policies. In the case of quality assurance, we believe there are four guiding principles that states should follow:

- States should take advantage of statewide, regional, and national networks for sharing high quality offerings, and reciprocity should be maximized.
- States should demonstrate a commitment to innovation and a desire to move the best of these practices into mainstream activities.
- State quality assurance policies should focus on the needs of the student.
- State policies should be shaped with the understanding that "distance" is not a defining characteristic of learning processes; rather it is one among many factors to take into account in designing effective programs.

Previews also have been found to lower initial expectation levels, attrition from orientation programs, and job turnover. For more information, see Breaugh, J.A., & Starke, M. (2000). Research on employee recruitment: So many studies, so many remaining questions. Journal of Management, 26 (3), 405-434.

Within these guiding principles, the quality assurance subcommittee submits the following recommendations for consideration by the Distance Learning Policy Leadership Group and SREB.

1. *States should review their current oversight policies to see if they meet the test of: a) taking advantage of regional and national assets; b) promoting innovation; and c) being student-centered.* This review should take place in the context of the principles described in this report, namely toward the goals of developing a "regional free-market" in the South and encouraging innovation. As a regional convening body, SREB can greatly aid in this process of review.

2. *States and institutions should consider adopting the "best practices" highlighted in this report, particularly those which use peer-review approaches.* Our survey of states turned up a number of encouraging practices and guidelines that are likely to improve the quality of distance learning opportunities.

3. *States should encourage their institutions to develop more effective evaluative mechanisms to learn student views concerning the quality of distance learning offerings.* Regional organizations like SREB, along with state and system-level virtual universities, should encourage states to include easily accessible student evaluations in their information systems and web sites. The recommendations made by the Pew Learning and Technology program for online course evaluation systems are a good starting point for designing these evaluation systems.

4. *SREB should extend and formalize its current "free trade zone" concept in the Electronic Campus, establishing a system of institutional and program reciprocity where approval under agreed-upon standards in one jurisdiction is extended to and accepted by others in the South.* While we do not expect that SREB alone can sort out the complexity of overlapping and conflicting standards described in this report, we do believe its leadership can establish a precedent that may inspire all parties toward better cooperation and more open access to all legitimate providers. States and regional accrediting bodies have a special obligation to coordinate their licensing and review activities and to establish ongoing structures for dialogue regarding acceptable standards in the field of distance learning.

5. *State agencies with responsibilities for oversight of distance learning activities have an obligation to work toward consistent, coordinated, unbiased, and non-duplicative reviews.* Again, we do not expect states to be able to sort out all of the issues raised by entities outside of their control (such as the Federal government), but we do believe that much progress can be made in quality assurance through communication and the development of a greater consensus within the standards-setting community operating in a state.

6. *States and institutions should accelerate their work to include outcome measures in their accountability mechanisms for both traditional and distance learning programs.* We are encouraged by the development of competency-based measures and exams in higher education as well as the emphasis placed upon outcome measures by accrediting bodies. Many of these efforts are aimed at developing better institutional outcome measures; but as was clearly apparent in recent national efforts to "grade" the states on student learning, there is a pressing need for more and better indicators.

7. *SREB, through the Electronic Campus and Data Exchange initiatives, should work to establish common definitions and state data reporting mechanisms for technology-mediated learning activities in the region.* A continuing challenge for states is the lack of common data collection techniques and even common definitions of the range of technology-mediated activity. SREB can build upon the work already underway to establish workable procedures to aid in assessment activities.

A Concluding Word

For many years, serious and dedicated people in colleges and universities have worked to develop and provide educational opportunities for students unable to attend a residential campus full time. The need for those opportunities will undoubtedly continue to grow. Institutions will continue to respond, and oversight bodies (i.e. the Triad) will continue to devote attention to assuring quality. The above recommendations build on steps already taken, and advances in quality assurance are likely to develop by continuing to combine deregulation with the judicious application of enforceable and targeted regulation.

Appendix A

April 2001 Quality Assurance Practices Survey Respondents

Alabama Commission on Higher Education
Arizona Board of Regents
Arkansas Department of Higher Education
California Postsecondary Education Commission
Connecticut Department of Higher Education
Delaware Higher Education Commission
Florida Community Colleges Learning Consortium
Idaho State Board of Education
Iowa State Board of Regents
Kentucky Council on Postsecondary Education
Louisiana Board of Regents
Maryland Higher Education Commission
Minnesota State Colleges and Universities
Mississippi Institutions of Higher Learning
Nebraska Coordinating Commission for Postsecondary Education
New Jersey Commission on Higher Education
New York State Education Department, Office of Higher Education
North Dakota University System
Ohio Learning Network
Oklahoma State Regents for Higher Education
Oregon University System
Rhode Island Office of Higher Education
South Carolina Commission on Higher Education
South Dakota Board of Regents
State Council of Higher Education for Virginia
Tennessee Higher Education Commission
Texas Higher Education Coordinating Board
University and Community College System of Nevada
University of Hawaii System
University of North Carolina Office of the President
University of Wisconsin System Administration
University System of Georgia
Utah System of Higher Education
West Virginia Higher Education Policy Commission

Appendix B

April 2001 Quality Assurance Practices Survey Questions

Q1. In general, our agency oversees and has policy-making authority for: (check all that apply)

1. Our agency oversees all higher education in our state
2. Our agency oversees all public universities in our state
3. Our agency oversees all community and technical colleges in our state
4. Our agency has program approval responsibility for independent colleges

Q2. Has your agency adopted rules or policy statements on distance learning quality expectations that apply to all institutions under your oversight or coordination?

Q3. Those statements are based on: (check all that apply)

1. SREB Principles of Good Practice
2. Regional accrediting organizations
3. Policy work in our state
4. Other

Q4. Are your agency-level rules or policy statements on distance learning quality issues available on your web site?

Q5. Has your agency developed a strategic plan for distance learning for all the institutions under your oversight or coordination?

Q6. Does that plan include provisions for quality assurance?

Q7. If applicable, when was that plan adopted

Q8. If applicable—is that plan available on your web site?

Q9. Has your agency required each of the institutions (or systems of institutions) to develop institution-specific or system-specific plans?

Q10. If yes, are the institution-specific strategic plans required to address quality assurance?

Q11. If yes, do you require updates of those plans?

Q12. If yes, how often?

Q13. Whether or not you have a plan that contains them, what are the most important elements that you would recommend a strategic plan to contain?

Q14. Our agency attempts to ensure that institutions meet the state's quality expectations for distance learning by (check all that apply):

1. Making rules and stating expectations
2. Having agency staff review proposed offerings
3. Requiring a peer review
4. Auditing offerings
5. Other

Q15. Either formally or informally, has your agency compared the results of on-campus cohorts to distance learning cohorts as to their success on state licensure exams (in fields such as nursing, for example)?

Q16. If so, what in general have you found?

Q17. If your agency is using "outcome measures" to assess the quality of distance learning offerings, please provide a description of those measures or identify a web site where they are described. What in general have you found?

Please evaluate the following items as to their value or importance (in your experience) in ensuring, at the state or agency level, high-quality distance learning offerings.

1 = Very Effective
2 = Effective
3 = Somewhat effective
4 = Ineffective
5 = Very Ineffective

Q18. Effectiveness of stating expectations
(Please comment on how you have used or could use this approach to improve quality)

Q19. Effectiveness of prior certification by the CAO
(Please comment on how you have used or could use this approach to improve quality)

Q20. Effectiveness of prior agency review
(Please comment on how you have used or could use this approach to improve quality)

Q21. Effectiveness of prior peer review
(Please comment on how you have used or could use this approach to improve quality)

Q22. Effectiveness of quality audits
(Please comment on how you have used or could use this approach to improve quality)

Q23. Effectiveness of arranging showcases of best practices
(Please comment on how you have used or could use this approach to improve quality)

Q24. Effectiveness of competition/free market forces
(Please comment on how you have used or could use this approach to improve quality)

Q25. Effectiveness of Accrediting Agency review
(Please comment on how you have used or could use this approach to improve quality)

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